HONDA

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February 19, 2002

Docket Management, Room PL-401
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, D.C. 20590

Subject: Docket No. NHTSA-01-11157
Notice of Proposed Rulemaking
49 CFR Parts 567, 571, 574 and 575
Tire Safety Information

Dear Sir or Madam:

Enclosed are the comments of Honda Motor Co., Ltd. and American Honda Motor Co., Inc. regarding the above-referenced docket.

We thank you for this opportunity to provide our comments. If you have any questions or require further clarification, please contact us at your earliest convenience.

Sincerely,

AMERICAN HONDA MOTOR CO., INC.

William R. Willen
Managing Counsel
Product Regulatory Office

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Enclosures

Comments of Honda Motor Co., Ltd. and American Honda Motor Co., Inc. on 49 CFR Parts 567, 571, 574 and 575 Docket No. NHTSA-01-11157

February 19, 2002

Honda appreciates the opportunity to comment on this Notice of Proposed Rulemaking for improving tire safety. We would like to offer the following comments on the proposals regarding the placard, consumer information and TIN.

Part 571.110, S4.3 Placard

Affixing the Placard

The proposed rule requires that the placard be permanently affixed to the B-pillar, or if the vehicle does not contain a B-pillar, to the driver's side door edge.

To obtain the best opportunity for permanence, placards must be affixed to a smooth, flat surface. In some vehicles, a suitable location is difficult to find, and the proposed wording of the tire placard location in §4.3 does not provide enough flexibility to deal with this problem.

Honda suggests amending the tire placard location in §4.3 as indicated by the italicized text below:

> Each vehicle shall show the information specified in §4.3(a) through (f) on a placard permanently affixed to the B-pillar ***or the driver's side door edge,*** or if the vehicles does not contain a B-pillar, the driver's side door edge ***or a surface equivalent to the B-pillar surface that is easily readable when the driver's door is opened.***

Placard Figure 1

Honda has several comments regarding proposed Figure 1.

- The title should be more meaningful. The figure includes both tire and loading information, but the title only says, "TIRE INFORMATION."
- The spatial arrangement of Figure 1 could be improved.
- Use of all caps versus mixed text could be improved.
- There is no apparent reason for "SEE OWNER'S MANUAL FOR ADDITIONAL INFORMATION" being so much larger in Figure 1 than in Figure 2.
- The table layout is potentially unclear, which may result in critical confusion. Specifically, a consumer might misread the table vertically and mistakenly think their front and rear tires should be filled to 60 PSI, which could result in serious over-inflation and possible injury.
- The expression "UP TO VEHICLE CAPACITY WEIGHT" is unclear.
- The layout does not leave enough room to include the seating capacity of a middle seating row, if one is provided.

Placard Figure 2

Honda also has several comments regarding proposed Figure 2.

- NHTSA has not described how to present the remaining capacity information, if the tire information is separated from Figure 2.
- The proposal claims a red border is required, but it is not called out in Figure 2.
- The spare tire inflation pressure should have some distinction from other tire pressures to help avoid critical confusion. It may be preferable to not indicate the spare tire pressure at all and simply say "see tire."

We have attached alternative Figure drawings to demonstrate how NHTSA's proposed "vehicle placard" might be improved.

Part 571.110, S4.3(a) Placard

From the viewpoint of placard size, the abbreviation "LBS." should be allowed as an alternative to "POUNDS."

Part 575.6 Consumer Information Requirements

The requirement for a glossary of tire terminology, §575.6(a)(4)(iii), is unclear with regard to what terms are non-technical in S3 of FMVSS Nos. 110 and 139. All of the terms defined in §571.110, S3 appear to be technical terms, and beyond the scope of the consumer's knowledge and interest.

NHTSA has requested comments on verbatim owner's manual text. We think that NHTSA should not require verbatim text in the owner's manual. Perhaps NHTSA could simply define certain concepts to be conveyed and allow manufacturers discretion regarding how to convey those concepts.

If NHTSA insists on requiring verbatim text, or even if the agency provides sample text as it has done in §575.6(a)(4)(v)(E), the text provided by NHTSA must be improved. Regulatory text, by its very nature, has a vocabulary that is different than what a manufacturer uses in communicating with its customers. For example, Honda uses the words "tongue weight" while NHTSA's proposed text uses the words "load from your trailer will be transferred to your vehicle." A sample of Honda's owner's manual loading instructions is attached (see the page titled Carrying Cargo).

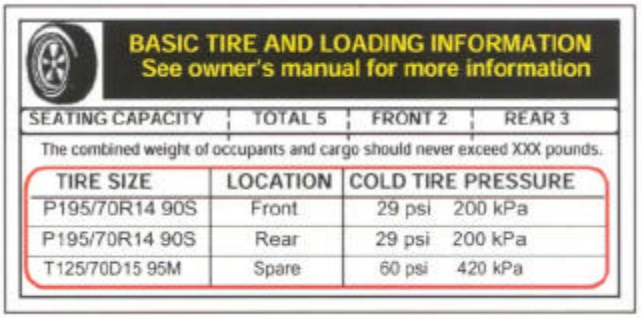
Part 574.5 Tire Identification Requirements

NHTSA proposes to reorder the sequence of the TIN (Tire Identification Number) characters. This means that for some period of time, consumers would be confronted with tires in the market that are marked with TINs having two different compositions. Vehicle manufacturers would be required to provide explanations for two TIN compositions in owner's manuals.

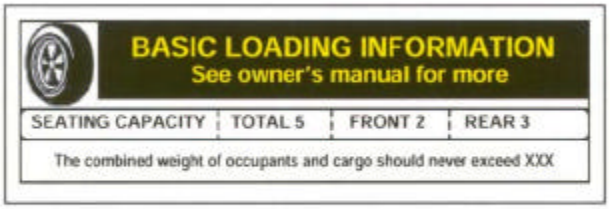
Although the proposed TIN changes may make the identification number more user-friendly and readable, Honda believes the changes could actually create additional confusion for consumers because different compositions will be available for a significant period of time until tires with the old composition disappear completely.

Rather than adding another TIN format and necessitating that consumers review and differentiate between two TIN definitions, we suggest that NHTSA retain the current TIN order and require that manufacturers provide an explanation of the TIN in the owner's manual. In the event of a recall, this simpler approach would achieve improved owner understanding.

Alternative Figure 1



Alternative Figure 2



Load Limit

The maximum load for your car is 850 lbs (395 kg).

This figure includes the total weight of all occupants, cargo, accessories, and the tongue weight if you are towing a trailer.

To figure out how much cargo you can carry:

- Add up the weight of all occupants.
- If you are towing a trailer, add the tongue weight to the number above.
- Subtract the total from 850 lbs (395 kg).

The final number is the total weight of cargo you can carry.

⚠WARNING

Overloading or improper loading can affect handling and stability and cause a crash in which you can be hurt or killed.

Follow all load limits and other loading guidelines in this manual.

Carrying Items in the Passenger Compartment

- Store or secure all items that could be thrown around and hurt someone during a crash.
- Do not put any items on top of the rear shelf. They can block your view and be thrown around the car during a crash.
- Be sure items placed on the floor behind the front seats cannot roll under the seats and interfere with the driver's ability to operate the pedals, or with the proper operation of the seats.
- Keep the glove box closed while driving. If the lid is open, a passenger could injure their knees during a crash or sudden stop.